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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

J.G. JR., by and through his  
Guardian Ad Litem KATHERINE  
ELLIOTT,

v.

COUNTY OF MENDOCINO, et al.

Respondents.

Case No. C 06-03342 WHA

STIPULATED REQUEST FOR ORDER  
CHANGING TIME [LOCAL RULE 6.2]

**RECITALS**

1. The parties have had difficulty scheduling depositions in this matter due to the health of plaintiff's counsel, the schedules of the attorneys and witnesses, and the unwillingness of third party witnesses from the Mendocino County Department of Social Services and the Mendocino County Public Defender's Office to produce relevant documents at depositions without a court order compelling such production.<sup>1</sup>

2. The parties anticipate that the witnesses yet to be deposed may identify additional witnesses and documents not yet known to the parties, which may create the necessary for further depositions and the service of document subpoenas to third parties. Since the parties

<sup>1</sup>In recent weeks, plaintiff's counsel has had an emergency room visit and two surgical procedures regarding kidney stones that caused scheduled depositions to be postponed.

1 have not yet deposed all of the percipient witnesses who may testify at trial, disclosure of topics  
2 requiring expert testimony, and the names and credentials of the experts the parties intend to use  
3 at trial, is premature. The parties would rather make such disclosures after the percipient  
4 witness depositions have been completed.

5  
6 **STIPULATION**

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8 In consideration of the foregoing Recitals, the parties, by and through their respective  
9 attorneys, hereby stipulate as follows:

10 1. All discovery cutoffs, expert and non-expert, stated in the court's Case Management  
11 Order of September 21, 2006, shall be continued 30 days. The new cutoff date shall be as  
12 follows:

- 13 a. Non-expert discovery cutoff – May 27, 2007  
14 b. Last day for designation of expert testimony and disclosure of full expert  
15 reports – May 27, 2007

16 2. All remaining dates and time frames set forth in the September 21, 2006, Case  
17 Management Order shall remain in effect.

18 Dated: 4/26, 2007

CARTER, VANNUCCI & MOMSEN, LLP

19  
20 BY Brian S. Momsen  
21 Brian S. Momsen, Esq.  
Attorneys for Plaintiff

22 Dated: 4-26, 2007

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24 BY Doug Losak  
25 Doug Losak, Esq.  
26 Attorneys for Defendant County of Mendocino  
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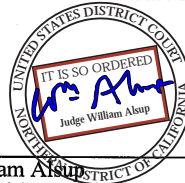
STIPULATED REQUEST FOR ORDER CHANGING TIME - Case No. C 06-03342 WHA

**ORDER**

Good cause appearing therefore, PURSUANT TO STIPULATION, IT IS SO ORDERED that the non-expert discovery cutoff and the last day for designation of expert testimony and disclosure of full expert reports under FRCP 26(a)(2) shall be continued 30 days, or until May 27, 2007. All remaining dates and time frames set forth in the Court's Case Management Order of September 21, 2006, remain in effect.

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Dated: May 1, 2007



William Alsup  
United States District Judge